

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03 MDL 1570 (GBD) (SN) ECF Case
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This document relates to:

Jessica DeRubbio v. Islamic Republic of Iran, No. 1:18-cv-05306 (GBD) (SN)

Jerry S. Goldman, Esq., hereby states under penalty of perjury that:

1. I am an attorney representing the *DeRubbio* plaintiffs in the above-captioned litigation, and I submit this declaration in support of the Motion for Corrections to Order of Judgment against the Islamic Republic of Iran (“Iran”) on behalf of Kathleen Granados.
2. The source of my information and the basis for my belief in my statements contained herein are my personal involvement in this matter; my firm’s representation of the *DeRubbio* plaintiffs in connection with the September 11th litigation against the terror defendants; other court records relating to the multi-district litigation to which the *DeRubbio* plaintiffs are parties; conversations had with family members to the *DeRubbio* plaintiffs; file records; and conversations with counsel to other September 11th plaintiffs. Any matters about which I lack personal knowledge are asserted herein upon information and belief.
3. This Declaration and the attached Proposed Order and modified Exhibits are submitted in light of notice we received that an individual plaintiff included in our January 15, 2020 Motion for Final Damages Judgment (ECF No. 5556), which was granted on February 12, 2020 (ECF No. 5919), does not wish to have a judgment against the Republic of Iran at this time.

4. Plaintiffs' counsel filed for Kathleen Granados who appears on line 2 of Exhibit A to ECF No. 5919, but Ms. Granados has confirmed to counsel in writing that she does not wish to have a judgment against the Republic of Iran at this time.

5. Given that Kathleen Granados has confirmed to counsel that she does not wish to have a judgment against the Republic of Iran at this time, we ask that the judgment for Kathleen Granados be vacated and that the Clerk remove Kathleen Granados from the Judgment Index.

Dated: New York, New York
August 4, 2020

/s/ Jerry S. Goldman
Jerry S. Goldman, Esq.